

FILED  
Clerk  
District Court

JAN 19 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

KRISTIN D. ST. PETER  
Assistant Attorney General  
Commonwealth of the Northern Mariana Islands  
Office of the Attorney General-Civil Division  
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Caller Box 10007  
Saipan, MP 96950

Attorney for: **Defendants CNMI, Forelli, Bush, Cotton and Brown**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, NICOLE C. FORELLI,  
WILLIAM C. BUSH, D. DOUGLAS COTTON,  
L. DAVID SOSEBEE, ANDREW CLAYTON,  
UNKNOWN AND UNNAMED PERSONS IN  
THE CNMI OFFICE OF THE ATTORNEY  
GENERAL, ALEXANDRO C. CASTRO, JOHN  
A. MANGLONA, TIMOTHY H. BELLAS,  
PAMELA BROWN, ROBERT BISOM, AND  
JAY H. SORENSEN,

Defendants.

Case No. 05-0027

**DEFENDANTS' NOTICE OF REPLY TO  
PLAINTIFF'S MEMORANDUM OPPOSING  
DEFENDANT CNMI'S MOTION TO  
DISMISS**

[ L.R. 7.1 (c) (3) ]

Date: February 9, 2006

Time: 9:00 AM

Judge: Alex R. Munson

**NOTICE**

PLEASE TAKE NOTICE THAT on February 9, 2006, at 9:00 a.m., or as soon thereafter as the  
matter may be heard, in the above-entitled Court, the Office of the Attorney General of the  
Commonwealth of the Northern Mariana Islands, on behalf of Defendants Commonwealth of the

1 Northern Mariana Islands, Nicole Forelli, William Bush, D. Douglas Cotton, and Pamela Brown, will  
2 and hereby do move this Court, pursuant to Rules 12(b)(6) of the Federal Rules of Civil Procedure to  
3 dismiss this action for failure to state a claim upon which relief can be granted.

4 This Motion is based upon this Notice of Motion, Motion and incorporated Memorandum of  
5 Points and Authorities, and Defendants' Reply to Plaintiff's Memorandum Opposing Defendant  
6 CNMI's Motion to Dismiss, all pleadings and papers on file herein, all matters of which judicial notice  
7 may be taken, and upon such further argument and evidence as may be considered by the Court at or  
8 before the hearing on this matter.

9 Respectfully submitted,

10 OFFICE OF THE ATTORNEY GENERAL

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13 Dated: January 19, 2006.

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By   
Kristin D. St. Peter